

Exhibit A

*LL COMMENTS 9/10 to Akin – Draft on September 10, 2023
Confidential*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

CELSIUS NETWORK LLC, *et al.*,¹

Debtors.

CELSIUS NETWORK LIMITED,

Plaintiff,

v.

STAKEHOUND SA,

Defendant.

Chapter 11

Case No. 22-10964 (MG)

Jointly Administered

Adversary Proceeding
No. 23-01138 (MG)

**JOINT STIPULATION BETWEEN PLAINTIFF CELSIUS NETWORK LIMITED AND
DEFENDANT STAKEHOUND SA**

This stipulation and scheduling order (“Stipulation”) is entered into by and among Plaintiff Celsius Network Limited (“Celsius”) and Defendant StakeHound S.A. (“StakeHound”) in the above-captioned adversary proceeding in connection with the evidentiary hearing scheduled for September 27, 2023 (the “Hearing”). The parties agree and stipulate as follows:

1. StakeHound shall provide responses and objections to Celsius’ *First Requests for Production of Documents Directed to StakeHound SA* dated September 4, 2023 **on or before September 11, 2023** and shall make its production of responsive, non-privileged documents on a rolling basis to be completed **on or before September 18~~5~~, 2023 at 5:00 pm EDT** [\(that date, or such earlier date on which StakeHound completes its production and advises Celsius’ undersigned](#)

¹ The Debtors in these chapter 11 cases (the “Chapter 11 Cases”), along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The Debtors’ service address in these Chapter 11 Cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

counsel by email that StakeHound's production is complete, the "First StakeHound Completion Date").

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2. Celsius shall provide responses and objections to StakeHound's *First Request for Production of Documents Directed to Plaintiff Celsius Network Limited* dated September 8, 2023 **on or before September 15, 2023**, and shall make its production of responsive, non-privileged documents on a rolling basis to be completed ~~on at 5:00 pm EDT~~ on the date that is the same number of days after ~~the~~ StakeHound served Celsius' with its first requests as the number of days ~~between after~~ the date Celsius served StakeHound with its first requests ~~and through and including~~ the ~~date on which StakeHound is required to complete its production in response to those requests.~~ First StakeHound Completion Date.

3. With respect to any additional requests for documents that are sent prior to the Hearing, **responses and objections shall be due by the receiving party on or before the date that is 7 calendar days following service** thereof (which shall be sufficient if sent by email to counsel of record) and, with respect to any requested production of documents, the parties shall meet and confer in good faith in an effort to agree on appropriate response and production schedule, if any.

4. Privilege and redaction logs with respect to any document production shall be produced within two calendar days of the date for completion of that production.

5. Depositions noticed by either party may be conducted by Zoom or in-person (as agreed between the parties), and shall be completed **on or before Sunday, September 24, 2023 at 3:00 p.m. EDT.**

5.6. If the Parties cannot reach agreement following reasonable meet and confer efforts concerning any discovery or scheduling issue, either party may send a non-substantive email to

the Court requesting a telephonic conference. If the Court does not resolve the dispute during the telephonic conference, and if the Court desires briefing, such briefing shall comprise a simultaneous exchange of letters not to exceed three pages, within 24 hours of the conference (or such other period of time as the Court may direct).

~~6-7.~~ 6-7. **On or before September 18, 2023 at 12:00 noon EDT**, the parties shall exchange with one another a list of witnesses that each intends to call, or may call, at the Hearing.

~~7-8.~~ 7-8. **On ~~Monday~~ September 25, 2023 by 3:00 p.m. EDT** the parties shall exchange with one another a list of exhibits and the deposition designations that it intends to offer at the hearing. The parties shall provide each other with a copy of designations and exhibits.

~~8-9.~~ 8-9. **On September 26, 2023 by 9:00 a.m. EDT** each party shall identify for the other any objections they intend to assert concerning the other party's exhibits and deposition designations ("Objections").

~~9-10.~~ 9-10. **On ~~Tuesday~~, September 26, 2023 at 5:00 p.m.**, the parties shall meet and confer in an effort to resolve any objections identified in the pre-trial order in advance of the hearing.

~~10-11.~~ 10-11. The parties agree that witnesses may appear at the Hearing either in-person, or remotely via Zoom, at the election of the party which seeks to offer the witness.

~~11-12.~~ 11-12. Nothing contained herein shall be deemed a waiver or relinquishment by any party of any objection, any right to object to any discovery request, or to seek relief from the Court from any provision of this Stipulation on any grounds.

12-13. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Stipulation.

SO STIPULATED:

Date: [], 2023
New York, New York

/s/ []

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